

Application Number 10/015,984  
Amendment dated September 2, 2004  
Responsive to Office Action mailed March 4, 2004

### **REMARKS**

This amendment is responsive to the Office Action dated March 3, 2004. Applicant has amended claims 1, 11, 13 and 15. Claims 1-16 remain pending.

#### ***Voluntary amendments***

The preamble of claims 11 and 15 has been amended to more accurately reflect certain embodiments of the invention described on, for example, paragraph 0042 and illustrated in FIG. 3.

#### ***Information Disclosure Statement***

In the Office Action, the Examiner stated that the information disclosure statement filed May 20, 2002, paper no. 2, fails to comply with the provisions of 37 CFR 1.97, 1.98 and MPEP § 609 because the cited references (1) BrianMatter (now called Spreadsheet Blox) by "AlphaBlox" and (2) Gedafe (Generic Database Front-End) from Department fur Elektrotechnik, ETZ Zurich do not have a publication date.

Applicant submits that each of these references was retrieved from the Internet on March 7, 2002 as shown in the footer of each document. Unless an earlier date can be established, this date should be used as the publication date. Concurrent with this response, Applicant has resubmitted the references on an information disclosure statement that lists this date as the publication date for the references.

#### ***Trademarks***

The Examiner requested the use of the trademarks be capitalized wherever it appears and be accompanied by the generic terminology. Applicant has amended the specification to include the necessary trade mark designations.

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**Claim Rejection Under 35 U.S.C. § 103**

*Claims 1-3, 6, 7, 9 and 10*

In the Office Action, the Examiner rejected claims 1-3, 6, 7, 9 and 10 under 35 U.S.C. 103(a) as being unpatentable over Freivald et al. (U.S. 5,983,268) and Sitarski (U.S. 5,237,497). Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

The independent claim 1 of this group has been amended to more clearly identify that the calculation engine includes the ability to perform back-solving. Specifically, claim 1 has been amended to require that the calculation engine is "capable of both back-solving and forward-solving." This change is supported in the specification, for example at paragraph [0018]: "involving both back-solving and 'forward-solving'", and at paragraph [0052]: "If a target cell is to be changed, then the back-solve is performed." As another example, the specification at page 11, paragraph [0044], states "... the calculation engine is also able to deal with complex relationships along more than one axis or dimension. A number of iterations are typically used involving both back-solving and forward-solving..."

Consequently, in contrast to claim 1, as amended, neither Freivald nor Sitarski teach or suggest a calculation engine having the claimed the back-solving attribute for a multi-dimensional data store.

Moreover, Freivald describes a change-detection tool for detecting changes in numerical fields within Internet pages.<sup>1</sup> In an unrelated field, Sitarski describes a computer system for managing water supplies and water storage capabilities. Applicant submits that a person skilled in the art of internet document change detection (Freivald) would not look to the field of water system flow processing (Sitarski) for guidance in solving a known problem or shortcoming with

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<sup>1</sup> For example, Freivald col. 1, lines 25 -35 states: "Users often wish to know when changes are made to certain web pages. The parent application disclosed a change-detection tool which allows users to register web pages. These registered web pages are periodically fetched and compared to a stored checksum for the registered page to determine if a change has occurred. When a change is detected, the user is notified by e-mail. The change-detection tool of the parent application allows user to select portions of a web-page document for change detection while other portions are ignored."

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the Freivald system. Applicant submits that it would not be obvious to modify the Freivald internet document change detection system in view of the Sitarski water management and planning system, and respectfully asks that the Examiner reconsider.

Furthermore, the Examiner has also identified no teaching in the prior art of a motivation to combine the teaching of the applied references. Specifically, the Examiner has identified no motivation found within the prior art that teaches the modification of the Freivald internet document change detection system in view of the Sitarski water management and planning system. The Examiner has failed to explain why one of ordinary skill in the art would have looked to the Sitarski water management planning system for modification of the Freivald internet document change detection system.

Claims 2, 3, 6, 7, 9 and 10 depend from claim 1, and are therefore neither anticipated nor obvious; hence Applicant respectfully submit that the rejections should be withdrawn.

*Claims 4, 5 and 8*

In the Office Action, the Examiner rejected claims 4, 5 and 8 under 35 U.S.C. 103(a) as being unpatentable over Freivald et al. (U.S. 5,983,268) and Sitarski (U.S. 5,237,497) as applied to claim 1 above and further in view of Beauchamp et al. (U.S. 6,621,505).

Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. Beauchamp fails to overcome the deficiencies of Freivald and Sitarski. For example, Beauchamp fails to teach or suggest a calculation engine includes the ability to perform back-solving for a multi-dimensional data store. Claims 4, 5, and 8 depend from claim 1, and are neither anticipated nor obvious for at least the reasons set forth above with respect to claim 1.

*Claims 11-16*

In the Office Action, the Examiner rejected claims 11 and 13-16 under 35 U.S.C. 103(a) as being unpatentable over Freivald et al. (U.S. 5,983,268) and Sitarski (U.S. 5,237,497) and Bhansali et al. (U.S. 6,006,239). Applicant respectfully traverses the rejection to the extent such rejections may be considered applicable to the claims as amended. The applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

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Independent claims 11 and 15 have been amended to require a calculation engine "capable of both back-solving and forward-solving." Claim 11 has been further amended to require that, in response to a user action, the browser send a "Request Calculate" to the server, the requested calculation requiring the calculation engine to use back-solving. Claim 15 has been amended to require the server forwarding the "Request Calculate" message including changed data to a calculation engine, the requested calculation requiring the calculation engine to use back-solving.

As discussed above, the backsolving attribute is neither mentioned nor alluded to in either Freivald or Sitarski or Bhansali. Furthermore, it would not be obvious to modify the Freivald internet document change detection system in view of the Sitarski water management and planning system, and the Examiner has identified no teaching in the prior art of a motivation to combine the applied references as suggested by the Examiner.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant's claims 1-16 under 35 U.S.C. 103(a). Withdrawal of this rejection is requested.

***Prior art made of record and not relied upon***

In the Office Action, the Examiner indicated that the following references were made of record but not relied upon:

*A. Garman (U.S. Pat. No. 5,926,822) discloses a transformation of real time data into times series and filtered real time data within a spreadsheet application; and*

*B. Cho et al. (U.S. Pat. No. 6,539,403 B2) discloses a method and system for facilitating networked information exchange.*

Applicant has reviewed this prior art and do not find it relevant.

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### CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date:

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